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# **TRANSPORTATION CONTROL MEASURE SUBSTITUTION**

## **LA0C8382 - Sepulveda Boulevard Bus Stop Improvement**

### **DRAFT REPORT**

**June 2008**

## INTRODUCTION

Transportation Control Measures (TCMs) are defined as strategies that adjust trip patterns or otherwise modify vehicle use in ways that reduce air pollutant emissions, and which are specifically identified and committed to in the most recently approved Air Quality Management Plan (AQMP)/ State Implementation plan (SIP). TCMs are included in an AQMP as part of the overall control strategy to demonstrate a region's ability to come into attainment with the National Ambient Air Quality Standards (NAAQS). In the SCAG region, TCM type projects are considered committed once they have funds programmed for right-of-way or construction in an approved SCAG Regional Transportation Improvement Program (RTIP). When a committed TCM cannot be delivered or will be significantly delayed, the substitution of the TCM follows the process specified in the Clean Air Act (CAA) §176(c).

The Los Angeles County Metropolitan Transportation Authority (MTA) has requested that SCAG substitute a planned bus stop improvement project included as a TCM in the South Coast Ozone SIP with a new bus stop improvement project (see Appendix A). As documented herein, the proposed substitution is consistent with federal and state requirements, including the SAFETEA-LU planning requirements and the U.S. Environmental Protection Agency's (EPA) Transportation Conformity Rule

## TCM SUBSTITUTION PROCESS

The substitution process set forth in SAFETEA-LU and the Transportation Conformity Rule is included in the 2007 AQMP for the South Coast Air Basin and described in SCAG's 2008 RTIP Guidelines.

The County Transportation Commissions (CTCs) and/or project sponsors notify SCAG when a TCM project cannot be delivered or will be significantly delayed. SCAG and the CTCs then identify and evaluate possible replacement measures for individual substitutions with consultation of the Transportation Conformity Working Group (TCWG), which includes members from all affected jurisdictions, federal, state and/or local air quality agencies and transportation agencies.

Substitution of individual TCMs is provided for by the CAA §176(c), under the following conditions:

- "(i) if the substitute measures achieve equivalent or greater emissions reductions than the control measure to be replaced, as demonstrated with an emissions impact analysis that is consistent with the current methodology used for evaluating the replaced control measure in the implementation plan;
- "(ii) if the substitute control measures are implemented-
  - "(I) in accordance with a schedule that is consistent with the schedule provided for control measures in the implementation plan; or
  - "(II) if the implementation plan date for implementation of the control measure to be replaced has passed, as soon as practicable after the implementation plan date



- but not later than the date on which emission reductions are necessary to achieve the purpose of the implementation plan;
- "(iii) if the substitute and additional control measures are accompanied with evidence of adequate personnel and funding and authority under State or local law to implement, monitor, and enforce the control measures;
- "(iv) if the substitute and additional control measures were developed through a collaborative process that included--
- "(I) participation by representatives of all affected jurisdictions (including local air pollution control agencies, the State air pollution control agency, and State and local transportation agencies);
  - "(II) consultation with the Administrator; and
  - "(III) reasonable public notice and opportunity for comment; and
- "(v) if the metropolitan planning organization, State air pollution control agency, and the Administrator concur with the equivalency of the substitute or additional control measures."

In addition to the conditions above, the 2007 South Coast AQMP states that the substitute project shall be in the same air basin and preferably be located in the same geographic area and preferably serve the same demographic subpopulation as the TCM being replaced.

A TCM substitution does not require a new conformity determination or a formal SIP revision. SCAG adoption of the new TCM with concurrence of the U.S. EPA and California Air Resources Board (ARB) will rescind the original TCM and apply the new measure.

## PROJECT DESCRIPTION

The 2006 RTIP included LA0C8382 – Sepulveda Boulevard Bus Stop Improvement Program, which included bus stop amenities such as lighting, signage, landscaping, and shelters with a completion date of June 2010. Obstacles to the planning and implementation of this project by the completion date have been identified. Consequently, MTA proposes to substitute a new project for LA0C8382. MTA has requested that LAF1601 – San Gabriel City-Wide Bus Shelter Installation be used as the substitute. This is a new project that would install bus shelters at existing bus stops on Metro and Montebello Bus Line routes, and is not yet classified as a committed TCM.

## COMPLIANCE WITH SUBSTITUTION REQUIREMENTS

*Interagency Consultation.* Interagency consultation on the proposed substitution occurred at SCAG's publicly noticed TCWG meetings on March 25 and June 24, 2008, prior to release of this document for a 30-day public review period. Any comments received will be discussed at the TCWG.



*Equivalent Emissions Reduction.* Projects such as bus stop improvements are classified as TCMs in the South Coast Air Basin even though there is no analytical method available to determine emission reductions from such projects. Though bus stop improvements are considered TCMs, they are not part of the transportation demand model and no emission reduction credit is taken in the South Coast Ozone State Implementation Plan or any conformity analysis. Since the scope of the original and proposed substitute projects are generally equivalent, any potential air quality benefit would also be equivalent.

*Similar Geographic Area.* Both projects are located within the Los Angeles County portion of the South Coast Air Basin.

*Full Funding.* The proposed project has secured CMAQ funding through MTA's 2007 Call for Projects process to construct and maintain the bus stop.

*Similar Time Frame.* The proposed project will be operational by January 2013.

*Timely Implementation.* The proposed substitution is the means by which the obstacle to implementation of the Sepulveda Boulevard Bus Stop Improvement Program TCM is being overcome. The replacement project will be monitored through TCM Timely Implementation Reports that SCAG releases for public review and submits for federal approval.

*Legal Authority.* The City of San Gabriel in cooperation with MTA has legal authority to implement and operate the substitute project.

*Agency Review and Adoption.* After approval by SCAG's Energy and Environment Committee, the substitution will be presented to SCAG's Regional Council for adoption. Concurrence from U.S. EPA and ARB will rescind the original TCM and apply the new measure.



## **Appendix A**

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### **MTA Substitution Request**

PRELIMINARY DRAFT



**Metro**

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Metropolitan Transportation Authority

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March 24, 2008

Mr. Rich Macias  
Interim Director of Planning and Policy  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> floor  
Los Angeles, CA 90017

Attention: Jonathan Nadler


**SUBSTITUTE 2008 RTIP TCM PROJECT  
LA008382 - SEPULVEDA BLVD BUS STOP IMPROVEMENT PROGRAM**

Dear Mr. Macias,

The Los Angeles County Metropolitan Transportation Authority (LACMTA) has identified through the 2008 Regional Transportation Improvement Program (RTIP) Adoption process that Transportation Control Measure (TCM) project LA008382 — Sepulveda Bus Stop Improvement Program will not be implemented by Culver City, the lead agency. LACMTA requests that the Southern California Association of Governments (SCAG) accept the substitution of this TCM project with a new TCM project that will be added to the 2008 RTIP Adoption.

LACMTA requests that SCAG allow LA008382-Sepulveda Boulevard Bus Stop Improvement Program project to be substituted in the 2008 RTIP with a new TCM project LAF1601-San Gabriel City-Wide Bus Shelter Installation. These projects are similar in scope and completion timelines, and thus the substitute TCM project will offer comparative air quality benefits to the region (see enclosure).

Please contact Herman Cheng at (213) 922-2453 or by e-mail at [chenghmetro.net](mailto:chenghmetro.net), should you have any questions

Sincerely,  
  
FRANK FLORES  
Executive Officer  
Programming and Policy Analysis